

Schedule C
PG&E's False and Misleading Statements

#	Date	Speaker & Source	Alleged Misstatement in RKS Amendment	Category
1	April 29, 2015	Christopher Johns Conference Call	¶ 231: <i>"We're stepping up our vegetation management activities to mitigate wildfire risk and improve access for firefighters."</i>	Reassurance as to Safety Efforts Vegetation Management
2	October 16, 2015	PG&E 2015 Corporate Responsibility and Sustainability Report	¶ 234: <i>"Each year, PG&E's Vegetation Management department, in consultation with utility arborists and foresters, inspects every mile of power line in our service area for public safety and electric reliability. We do so in compliance with relevant laws..."</i>	Pole and Line Inspection and Maintenance Vegetation Management Compliance
3	Nov. 18, 2015	Patrick Hogan Senate Testimony	¶ 242: <i>"So as I mentioned earlier, our SCADA capabilities where we are able to take our reclosers out of service remotely, we first focus on the wildfire areas and then we have about 130 some odd locations, we are going to complete about 126 of those this year, just about done with that program, which leaves six for next year, which will be completed."</i>	Reclosers

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4	October 6, 2016	PG&E 2016 Corporate Responsibility and Sustainability Report	¶ 245: “ <i>Each year</i> , PG&E’s Vegetation Management department and its contracting arborists and foresters <i>inspect miles of power lines in our service area for public safety</i> and electric reliability. <i>We do so in compliance with relevant laws . . .</i> ”	Pole and Line Inspection and Maintenance Vegetation Management Compliance
5	August 9, 2017	PG&E 2017 Corporate Responsibility and Sustainability Report	¶ 252: “ <i>PG&E prunes and removes trees growing too close to power lines... Through a well-established and innovative vegetation management program, PG&E balances the need to maintain a vast system of trees growing along power lines while complying with state and federal regulations and delivering safe, reliable and affordable electric service.</i> ”	Reassurance as to Safety Efforts Vegetation Management Compliance
6	May 23, 2016	Anthony Earley Press Release	¶ 259: “ <i>Earley and other senior executives also discussed continued progress on safety</i> , reliability and other goals, as well as PG&E’s strategy for the future [at the annual shareholder meeting]. Earley said, ‘ <i>We’ve continued to demonstrate leadership and commitment on safety</i> . We’re delivering the most reliable service in our company’s history.’”	Reassurance as to Safety Efforts

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7	Nov. 4, 2016	Anthony Earley Conference Call	¶ 264: <i>“The improvements we have made in safety and reliability over the last six years have put us in a position to deliver strong financial results going forward.”</i>	Reassurance as to Safety Efforts
8	May 31, 2017	Geisha Williams Press Release	¶ 269: “Yesterday, in remarks at the joint annual shareholders meeting of PG&E Corporation and Pacific Gas and Electric Company, [CEO] Williams highlighted the companies’ <i>progress on safety</i> , reliability and reducing greenhouse gas emissions, among other accomplishments. <i>She reaffirmed PG&E’s commitment to safety and operational excellence</i> , delivering for customers and leading the way to achieve California’s clean energy goals.”	Reassurance as to Safety Efforts
9	October 31, 2017	PG&E Press Release	¶ 277: <i>“PG&E follows all applicable federal and state vegetation clearance requirements and performs regular power line tree safety activities in accordance with industry standards, guidelines, and acceptable procedures that help to reduce outages or fires caused by trees or other vegetation.”</i>	Vegetation Management Compliance

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10	November 2, 2017	Geisha Williams Conference Call	<p>¶ 283:</p> <p>...</p> <p>“I know there’s a lot of interest in our pole maintenance and vegetation management programs, so let me address these as well. . .</p> <p><i>We also have one of, if not, the most comprehensive vegetation management programs in the country.</i> Our vegetation management program manages about 123 million trees across the service territory. <i>And every year, we inspect every segment of the 99,000 miles of overhead line and we clear vegetation as needed. . .Typically, we spend about \$200 million every year to line clear or remove 1.3 million trees to mitigate both the risk of wildfires and to prevent electric outages. With the drought and the tree mortality crisis we’ve experienced in California, we have been expanding our vegetation management work since 2014.</i></p> <p><i>In 2016, we spent an additional \$200 million, essentially doubling our typical vegetation management spending last year...”</i></p>	<p>Reassurance as to Safety Efforts</p> <p>Vegetation Management</p> <p>Pole and Line Inspection and Maintenance</p>

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11	November 2, 2017	Nickolas Stavropoulos Conference Call	<p>¶ 290:</p> <p>“[ANALYST:] And then, I guess, <i>can you discuss your vegetation practices for trees that are located near power lines?</i> I guess we’ve seen sort of end reports that have come out for some of your peers that they sort of track vegetation that’s within certain distances from the lines, and they basically make their decisions on what to do based on sort of updates.</p> <p>[Stavropoulos:]. . . We manage about 123 million trees that are near and adjacent to our facilities. <i>And over the last 2 years, we’ve doubled the amount that we’ve invested in veg[etation] management.</i> That includes line clearing to remove parts of trees that are adjacent to our facilities as well as removal of dead and dying trees. So the program involves year-round effort to identify these dead and dying trees through inspection processes where we use foot and aerial patrols; we use LiDAR, which is light, detecting and ranging technology, to identify the trees that need to be worked. <i>We inspect all of our overhead lines every year, and we do second patrols in high fire danger areas at least twice a year. In some areas, we do as often as 4x a year.</i></p> <p>So it’s a very aggressive program. There are specific requirements around line clearing, and it depends upon the voltage of the lines. And it can range up to feet [sic] to as much a sort of 18 inches away from the facility. So there are all sorts of different requirements, depending upon where the facilities are located and the voltage of the facilities.”</p>	<p>Vegetation Management</p> <p>Pole and Line Inspection and Maintenance</p>

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12	November 5, 2017	PG&E Facts About PG&E's Wildfire and Prevention Safety Efforts	¶ 298: <i>"PG&E meets or exceeds all applicable federal and state vegetation clearance requirements."</i>	Compliance
13	May 25, 2018	PG&E Press Release	¶ 320: <ul style="list-style-type: none"> • "Following Governor Brown's January 2014 Drought State of Emergency Proclamation and the California Public Utilities Commission's Resolution ESRB- 4, PG&E has added enhanced measures to address areas particularly affected by drought and bark beetles including: ... • <i>PG&E meets or exceeds regulatory requirements for pole integrity management</i>, using a comprehensive database to manage multiple patrol and inspection schedules of our more than two million poles." 	Pole and Line Inspection and Maintenance Compliance

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14	June 8, 2018	PG&E Press Release	<p>¶ 326:</p> <p><i>Programs Overall Met State’s High Standards</i></p> <p>...</p> <p>“For example, <i>PG&E meets or exceeds regulatory requirements for pole integrity management</i>, using a comprehensive database to manage multiple patrol and inspection schedules of our more than two million poles.</p> <p>...</p> <p>Similarly, <i>under PG&E’s industry-leading Vegetation Management Program</i>, we inspect and monitor every PG&E overhead electric transmission and distribution line each year, with some locations patrolled multiple times. We also prune or remove approximately 1.4 million trees annually.”</p>	<p>Reassurance as to Safety Efforts</p> <p>Vegetation Management</p> <p>Pole and Line Inspection and Maintenance</p> <p>Compliance</p>

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15	June 8, 2018	PG&E Press Release	<p>¶ 335:</p> <p><i>“To address the growing threats posed by wildfires and extreme weather, and in light of the wildfires throughout our state last year, PG&E has launched the Community Wildfire Safety Program to help keep our customers and communities safe. Among the key components of the new program are. . .</i></p> <ul style="list-style-type: none"> • Public Safety Power Shutoff: As a last resort, <i>a program to proactively turn off electric power for safety when extreme fire danger conditions occur</i>, while helping customers prepare and providing early warning notification, when and where possible.” 	ESRB-8 & Community Safety Program

16	September 27, 2018	PG&E CPUC Website	<p>¶ 343:</p> <p>“PG&E’s Community Wildfire Safety Program implements additional precautionary measures intended to reduce wildfire threats. <i>It includes . . . executing protocols to temporarily turn off electric power for safety when extreme fire danger conditions are occurring.</i></p> <p>. . .</p> <p>Public Safety Power Shutoff is one component of the Community Wildfire Safety Program. <i>PG&E has created a set of procedures for. . . [d]etermining what combination of conditions necessitates turning off lines for safety.</i></p> <p>. . .</p> <p>PG&E will take a combination of many criteria into consideration, including:</p> <ul style="list-style-type: none"> • ‘Extreme’ fire danger threat level, as classified by the National Fire Danger Rating System • A Red Flag Warning declared by the National Weather Service • Low humidity levels, generally 20 percent and below • Sustained winds above approx. 25 mph and wind gusts in excess of approx. 45 mph • Site-specific conditions such as temperature, terrain and local climate • Critically dry vegetation that could serve as fuel for a wildfire • On-the-ground, real-time observations from PG&E field crews” 	<p>ESRB-8 & Community Safety Program</p>
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17	October 9, 2018	PG&E Press Release	<p>¶ 353:</p> <p>“[W]e are continuing to focus on <i>implementing additional precautionary measures</i> intended to further reduce wildfire threats, such as <i>working to remove and reduce dangerous vegetation, improving weather forecasting, upgrading emergency response warnings, [and] making lines and poles stronger in high fire threat areas</i>, and taking other actions to make our system, and our customers and communities, <i>even safer</i> in the face of a growing wildfire threat.”</p>	<p>Reassurance as to Safety Efforts</p> <p>Vegetation Management</p> <p>Pole and Line Inspection and Maintenance</p>
18	October 9, 2018	PG&E Press Release	<p>¶ 359:</p> <p>“To address the growing threats posed by wildfires and extreme weather, and in light of the wildfires throughout our state last year, <i>PG&E has launched the Community Wildfire Safety Program to help keep our customers and communities safe by implementing additional precautionary measures</i> intended to further reduce wildfire threats. Among the key components of the new program are. . .</p> <ul style="list-style-type: none"> Public Safety Power Shutoff: As a last resort, <i>a program to proactively turn off electric power for safety when extreme fire danger conditions occur</i>, while helping customers prepare and providing early warning notification, when and where possible.” 	<p>ESRB-8 & Community Safety Program</p>

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19	November 8, 2018	PG&E Tweet	¶ 366: “PG&E has determined that it will not proceed with plans today for a Public Safety Power Shutoff in portions of 8 Northern CA counties, <i>as weather conditions did not warrant this safety measure.</i> ”	ESRB-8 & Community Safety Program
20	March 2, 2018	PG&E YouTube Video	¶ 302 “PG&E prunes and removes over a million trees every year to ensure that hazardous trees can’t impact our lines. <i>And since the onset of the drought we’ve doubled our efforts.</i> ”	Vegetation Management
21	March 22, 2018	PG&E Press Release	¶ 307: “Among other things, the press release stated that the program focused on ‘ <i>doing more over the long term to harden the electric system to help reduce wildfire threats and to keep customers safe,</i> ’ including by ‘ <i>investing in stronger, coated power lines,</i> ’ spacing lines farther apart to prevent line-on-line contact during wind storms, and replacing wood poles with non-wood poles in the coming years.”	Reassurance as to Safety Efforts Pole and Line Inspection and Maintenance
22	March 22, 2018	PG&E Press Release	¶ 310: PG&E was “[a]ugmenting [their] already rigorous vegetation management practices based on the High Fire-Threat District map adopted in January 2018 by the California Public Utilities Commission.”	Reassurance as to Safety Efforts

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23	March 27, 2018	PG&E Press Release	¶ 313: “Under PG&E’s industry-leading Vegetation Management Program, <i>the company inspects and monitors every PG&E overhead electric transmission and distribution line each year</i> , with some locations patrolled multiple times.”	Pole and Line Inspection and Maintenance
24	May 3, 2018	Geisha Williams Conference Call	¶ 316: “ We have more than doubled our annual spend to manage vegetation from roughly \$190 million in 2013 to \$440 million in 2017 and we increased the frequency of our patrols , particularly in high fire threat areas, but the new normal needs new solutions. To that end, we recently announced our Community Wildfire Safety Program.”	Vegetation Management Pole and Line Inspection and Maintenance
25	July 16, 2018	Nickolas Stavropoulos	¶ 338: “Over the last seven years, we have accomplished so much together on our <i>journey to become one of the safest, most reliable energy companies</i> in the country. <i>As a team, we’ve worked to improve our culture, augment our operations, upskill our people and, most importantly, improve public and employee safety.</i> ”	Reassurance as to Safety Efforts

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26	September 27, 2018	PG&E ESRB-8 Shutoff Protocol	<p>¶ 340 (alteration in RKS Am.):</p> <p>“PG&E reasserted that following the 2017 wildfires, one of the ‘new and enhanced safety measures’ being implemented was the <i>‘[d]isabling [of] automatic reclosing of circuit breakers and reclosers[.]’</i>”</p>	Reclosers
27	October 1, 2018	David Gabbard FERC Application	<p>¶ 346:</p> <p>A. PG&E is currently implementing four mitigations to reduce overhead conductor risk. The first two mitigations revolve around equipment replacement work: additional overhead conductor replacement and additional insulator replacement. Replacing additional conductors and insulators reduces the likelihood that those conductors and insulators will fail, therefore reducing the likelihood that those failures will lead to transmission wires down</p> <p>Q. Describe the Tower Replacement Program and how that will address the Transmission Risk.</p> <p>A. The Tower Replacement Program is established to manage the replacement of steel structures that have reached the end of their useful lives. The program targets replacement of deteriorated structures where repair is either less cost effective or not feasible.”</p>	Pole and Line Inspection and Maintenance

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28	October 1, 2018	Jessica Tsang FERC Application	<p>¶ 349:</p> <p>Q. Please describe the allocation of expenses in Account 561 – Load Dispatching.</p> <p>A. This account includes expenses incurred for operating the transmission system safely, reliably, and in compliance with all applicable rules, standards and regulations. Some examples of activities for which expenses are incurred include:</p> <ul style="list-style-type: none"> Monitoring, assessing, and operating the power system and individual facilities in real- time to maintain safe and reliable operation of the transmission system; . . . <p>Q. Please describe the allocation of expenses in Account 563 – Overhead Line Expenses.</p> <p>A. This account includes expenses incurred for operating overhead transmission lines. Some examples of activities for which expenses are incurred include: • Patrolling and inspecting assets to identify any potential safety and reliability issues; . . .</p> <p>Q. Please describe the allocation of expenses in Account 571 – Maintenance of Overhead Lines.. . .”</p>	Compliance

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29	November 5, 2018	Geisha Williams Conference Call	<p>¶ 363:</p> <p><i>“We also have our public safety power shut off program that I mentioned earlier, and we’ll of course only utilize this as a last resort in the most extreme forecasted weather conditions.</i></p> <p><i>All of these efforts are in addition to our ongoing pole maintenance and visual and infrared inspections of our assets. We plan to continue patrolling our poles at frequencies within high fire threat areas beyond the compliance requirements in place in California. Collectively, this is an integrated comprehensive program to further reduce risk across our high fire threat areas.”</i></p>	<p>Pole and Line Inspection and Maintenance</p> <p>ESRB-8</p>
30	Multiple (RKS Am. ¶¶ 421-423.)	PG&E Forms 10-K and 10-Q	<p>¶ 421:</p> <p>Based on an evaluation of PG&E Corporation’s and the Utility’s disclosure controls and procedures as of December 31, 2015, PG&E Corporation’s and the Utility’s respective principal executive officers and principal financial officers have concluded that such controls and procedures are effective to ensure that information required to be disclosed by PG&E Corporation and the Utility in reports that the companies file or submit under the 1934 Act is (i) recorded, processed, summarized, and reported within the time periods specified in the SEC rules and forms, and (ii) accumulated and communicated to PG&E Corporation’s and the Utility’s management, including PG&E Corporation’s and the Utility’s respective principal executive officers and principal financial officers, or persons performing similar functions, as appropriate to allow timely decisions regarding required disclosure.</p>	<p>Disclosure Controls</p>